

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-CV-2521-SAG

**JOINT STIPULATION AND
[PROPOSED] ORDER AMENDING
INTERIM SCHEDULING ORDER**

The Plaintiffs and Defendants in the above-captioned matter (collectively, the “Parties”), by and through their undersigned counsel and pursuant to Local Rule 105.9, on this 8th day of October 2021, recite and stipulate as follows:

WHEREAS, on August 10, 2021, the Court approved the Parties’ stipulation amending the Interim Scheduling Order in the above-captioned matter, *see* ECF No. 495;

WHEREAS, under the revised Interim Scheduling Order, the deadline for the Parties to submit a joint letter brief to the Court regarding areas of dispute on (1) search terms, (2) Defendants’ objections to Plaintiffs’ Rule 34 requests for structured data, other than Defendants’ objections to the relevant time period for those requests, and (3) objections to interrogatories, is four weeks after the Court rules on the Parties’ August 13, 2021 discovery disputes, which is October 12, 2021;

WHEREAS, the Parties have had productive dialogue on these issues, but believe that additional time to further negotiate these issues will significantly narrow the areas of disagreement and areas of impasse that will require the Court’s resolution;

WHEREAS, the Parties have agreed to extend the deadline for the Parties to submit a joint letter brief to the Court regarding these issues to November 19, 2021;

THE PARTIES RESPECTFULLY REQUEST that the Court order that the deadline for the Parties to submit a joint letter brief to the Court regarding areas of dispute on (1) search terms, (2) Defendants’ objections to Plaintiffs’ Rule 34 requests for structured data, other than Defendants’ objections to the relevant time period for those requests, and (3) objections to interrogatories be extended to November 19, 2021.

Dated: October 8, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

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IT IS SO ORDERED.

DATED: _____

United States District Judge Stephanie A. Gallagher